

## REMARKS

Claims 1-6, 9-12, 15-18 are rejected under 35 U.S.C. 103(a) as being unpatentable over Peuse et al. (U.S. Patent No. 5,755,511) in view of Grimm (U.S. Patent No. 5,740,314) and Gronet et al. (U.S. Patent No. 5,155,336).

After entry of this Amendment, the pending claims are 1-20.

### Claim Objections

Claims 7, 13 and 19 are amended to insert a semicolon at the end of the first element of the claims.

Claims 6, 12 and 18 are amended to clarify that “a lamp receptable” and “a reflector cavity” are one of the plurality of lamp receptacles and reflector cavities.

### Claim Rejections

The rejection of claims 1-6, 9-12 and 15-18 is respectfully traversed. To establish prima obviousness of a claimed invention, all of the claim limitations must be taught or suggested by the prior art. MPEP 2143.03. Independent claims 1, 9 and 15 all require a plurality of lamp receptacles and reflector cavities formed in a monolithic member. None of the prior art of record discloses or suggests forming a plurality of lamp receptacles and reflector cavities in a monolithic member.

Peuse discloses in Figure 3A and at col. 7, lines 52-67, only a heating element 110. At col. 24, lines 45-52, Peuse describes a suitable heating element as using light pipes to deliver radiation from lamps, and it incorporates Gronet by reference. Figure 12 in Peuse shows a plurality of lamps and a water-cooled light pipe housing, but it does not disclose or suggest a plurality of lamp receptacles and reflector cavities formed in a monolithic member.

Gronet describes a heating element 18 at col. 3, lines 30-51 as having a plurality of lamps 19, each of which is mounted inside a light pipe 21, which is brazed or welded to openings in the walls of a cooling chamber 26. Figure 5 in Gronet illustrates the preferred assembly of the lamps in the light pipe. As described at col. 3, lines 57-59, and illustrated in Figure 5 in Gronet, two stainless steel tubes 31, 32 are placed in each light pipe to form the lamp assembly, and the interior surface of the lower stainless steel tube is gold plated to

maintain a high degree of reflectivity. Thus, Gronet does not disclose or suggest a plurality of lamp receptacles and reflector cavities formed in a monolithic member.

Grimm discloses in Figures 1-3 and at col. 4, line 66 to col. 5, line 5, a three-lamp array device with each lamp having a filament, bulb, base, electrical connectors and a reflector. As described at col. 5, lines 45-54, the lamps are held in an aluminum frame made of two aluminum bars that are held together by two thinner strips of aluminum and pieces of aluminum tape. Thus, Grimm does not disclose or suggest a plurality of lamp receptacles and reflector cavities formed in a monolithic member.

Since none of the references discloses a plurality of lamp receptacles and reflector cavities formed in a monolithic member, a prima facie case of obviousness has not been established.

It is also noted that the references do not suggest their combination. The device described by Grimm is intended for use at relatively low temperature on the order of 300°C (Figs. 8-19) in applications such as welding of plastics (col. 1, lines 25, 48). The rapid thermal processor of Peuse is intended for use in the manufacture of semiconductors at temperatures on the order of 1200°C. Since the two technologies are conducted at vastly different temperatures, one of skill in the art would not look to one technology for ideas to solve problems in the other technology.


The rejection of claims 6, 12 and 18 is also respectfully traversed. While Grimm discloses electrical connectors for each lamp, Grimm does not disclose or suggest a plurality of lead passages formed in a monolithic member.

In view of the foregoing, applicants believe that all of the claims are now in condition for allowance and respectfully requests the Examiner to pass the subject application to issue. If for any reason the Examiner believes any of the claims are not in condition for allowance, he is encouraged to phone the undersigned at (650) 493-4935 so that any remaining issues may be resolved.

Please charge the fee for a 2 Month Extension of Time and any additional fee due for the filing of this Amendment to Pennie & Edmonds LLP's Deposit Account No. 16-1150.

Respectfully submitted,

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 24,615  
Francis E. Morris (Reg. No.)  
**PENNIE & EDMONDS LLP**  
1155 Avenue of the Americas  
New York, NY 10036-2811  
(650) 849-7777